

Issues/Questions Identified at ULSD Workshop

- Update and issue a Q/A document – targeted end of Jan 05
- Registration
 - Small refiner application by 12/31/04
 - Entities/facilities defined by 12/31/05
- Work to improve and implement laboratory best practices
- Currently allowed alternative test methods for measuring diesel sulfur expire on 12/27/04. Anyone producing ultra-low sulfur diesel for early credits, starting on 6/1/2005, and/or for use in engines designed to meet the 2007 NO_x and PM standards, must use an appropriately qualified test method to measure the sulfur level. Otherwise, only ULSD produced beginning on June 1, 2006 would need to be tested using a qualified method. EPA will need 90-days to approve sulfur test methods.

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- Improve/discover new interface detection methods
- Additional time for turnover of tanks?
- 3 digit product codes – can this be addressed?
- Need for additional test movements of ULSD
 - Where is ULSD already being produced?
 - Where does the volume come from?
- What was the refinery gate specification that was assumed in pre-compliance report submitted to EPA?
 - Pipeline specs?
 - Terminal specs?
- How will consumers be educated regarding misfueling?

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- How to accommodate reductions in HHO due to interface with gasoline?
- There is a need for an on-site/field test for sulfur
- There is a need for lower cost test methods with better response time
- General education of all parties in supply chain
- There is a need for 15 ppm kero
- Some terminals may need customized software to track redesignations
- Follow-up conference